

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al

Case No. 18-OP-45132

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 17-OP-45004

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Videotaped Deposition of
KEITH MARTIN

April 3, 2019

9:11 a.m.

Taken at:

Ulmer & Berne

1660 W. 2nd Street, Suite 1100
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

1 acquired outside the performance of your
2 official duties, you can give an opinion, you
3 can give your personal opinion.

4 A. Again, it's my opinion that, you
5 know, we -- we got to this place somehow, and it
6 wasn't just through heroin or fentanyl.

7 Q. But my question was a little more
8 specific than that. My question was, without
9 heroin, without fentanyl, without carfentanil,
10 wouldn't you agree that -- would there be an
11 opioid epidemic in Ohio today?

12 MR. LEDLIE: Object to the form of
13 the question. Asked and answered. Calls for a
14 legal conclusion.

15 MR. BENNETT: Objection.
16 Speculation. Same instruction.

17 A. My personal belief is we would.

18 Q. What is that personal belief based
19 on?

20 A. I've talked to many parents who have
21 lost a child to an overdose, and to be quite
22 honest, it makes me sick because I'm tired of
23 talking to these parents. And in many, many
24 cases they started out taking an opiate and they
25 didn't start out using heroin or fentanyl, it

1 started some other way. And in almost -- in
2 many of those cases it started with either
3 OxyContin, oxycodone, Vicodin, Percocet,
4 something, whether it was a sports injury,
5 whether it was somebody giving it to their
6 child. So, you know, I'm basing that on my
7 conversations with parents who have buried their
8 children in Ohio.

9 Q. Let me ask you if you're familiar
10 with the Controlled Substance Act.

11 A. Yes.

12 Q. Are you familiar with the closed
13 system of pharmaceutical distribution under the
14 CSA?

15 A. No, I'm not.

16 Q. You've never heard of the closed
17 system of distribution?

18 A. No.

19 Q. Okay. Do you agree that most
20 diversion of prescription opioids happens
21 outside of this closed system?

22 MR. LEDLIE: Object to the form of
23 the question.

24 MR. BENNETT: Objection. Calls for
25 speculation.